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October 9, 2003



Mr. Thomas M. Dorman Kentucky Public Service Commission 211 Sower Boulevard P.O. Box 615 Frankfort, Kentucky 40601

RE: Case No. 2003-00379

Dear Mr. Dorman:

Enclosed please find the original and ten copies of Competitive Carriers of the South, Inc.'s ("CompSouth") Motion for Full Intervention. Please indicate receipt of this filing by your office by placing a file stamp on the extra copy and returning to me via the enclosed, self-addressed, stamped envelope.

Sincerely Yours,

Douglas F. Brent

Counsel to CompSouth

DFB:jms

Enc.

Cc: Parties of Record

COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED
OCT 1 0 2003 In the Matter of: REVIEW OF FEDERAL COMMUNICATIONS) CASE NO. 2003-00379 COMMISSION'S TRIENNIAL REVIEW ORDER REGARDING UNBUNDLING REQUIREMENTS FOR INDIVIDUAL NETWORK ELEMENTS

MOTION FOR FULL INTERVENTION

Pursuant to 807 KAR 5:001, Section 3(8) and Ordering paragraph 1 of the Order issued October 2, 2003, in the above-captioned proceeding, the Competitive Carriers of the South, Inc. ("CompSouth") submits this motion for full intervention in the abovecaptioned proceeding.

CompSouth is an association of certified, competing local service providers, many of which operate in Kentucky. While certain of CompSouth's members intend to participate individually in this matter, other members are not able to participate individually in the numerous state regulatory proceedings arising from the FCC's Triennial Review proceeding. Accordingly, participation by CompSouth on behalf of these members is likely to present issues that will assist the Commission without unduly complicating the proceedings.

¹ The members of CompSouth include: Access Integrated Networks, Inc., MCI, Birch Telecom, Business Telecom, Inc., Covad Communications Company, AT&T, NewSouth Communications Corp., Talk America, NuVox Communications, Inc., ITC^DeltaCom, Xspedius Communications, Momentum Business Solutions, Cinergy Communications Company, Network Telephone Corp., KMC Telecom, Z-Tel Communications, Inc., and IDS Telcom LLC.

CompSouth requests that all pleadings and other documents be served upon:

C. Kent Hatfield Douglas F. Brent Middleton Reutlinger 2500 Brown & Williamson Tower Louisville, KY 40202

A copy of this motion is being sent to the Attorney General and to the incumbent local exchange carriers identified in paragraph four of the Commission's Order. Any future pleadings will be served upon parties or as the Commission may otherwise direct.

For the reasons stated above, CompSouth asks that this Motion for Full Intervention be granted.

Respectfully submitted,

By:

C. Kent Hatfield Douglas F. Brent MIDDLETON REUTLINGER 2500 Brown & Williamson Tower Louisville, KY 40202 (502) 584-1135

COUNSEL FOR COMPSOUTH

CERTIFICATE OF SERVICE

This is to certify that I have this 9th day of October, 2003 caused to be served by United States mail a copy of the within and foregoing Motion to Intervene upon the following persons, properly addressed as follows:

Douglas F. Brent

Stephen R. Byars Vice President – External Affairs ALLTL Communications, Inc P.O. Box 1650 Lexington, Kentucky 40588-1650

Dorothy Chambers Regulatory & External Affairs BellSouth Telecommunications, Inc. 601 West Chestnut Street, Room 410 P.O. Box 32410 Louisville, Kentucky 40232 Hon. Ann Louise Cheverout Office of the Attorney General Utility & Rate Intervention Division 1024 Capital Center Drive Suite 200 Frankfort, Kentucky 40601-8204

Jouett Kinney Cincinnati Bell 201 East 4th Street Building 103-1610 Cincinnati, Ohio 45201